

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEVEN SHANNON)	CIVIL ACTION NO.18-11837
Plaintiff,)	
)	
v.)	COMPLAINT
)	
JOSEPH DOUGHERTY as owner of the)	
S/V PENINGO,)	
Defendant.)	

INTRODUCTION

1. This is an action for maritime personal injuries which occurred on or about July 1, 2017. While Mr. Shannon was operating his vessel, S/V HULA GIRL, it was struck by Mr. Dougherty's vessel, S/V PENINGO.

JURISDICTION

2. This is a case of maritime jurisdiction pursuant to 28 U.S.C. § 1333(1).

THE PARTIES

3. The Plaintiff, Steven Shannon, is of legal age and resides in Dorchester, Massachusetts. At all relevant times, Mr. Shannon was the owner of the S/V HULA GIRL.
4. The Defendant, Peter Dougherty, is an individual and resides in Charlestown, Massachusetts. At all relevant times, Mr. Dougherty was the owner of the S/V PENINGO.

FACTUAL ALLEGATIONS

5. On or about July 1, 2017, the Plaintiff was operating his vessel, S/V HULA GIRL under sail.
6. At that same time and place, the Defendant was operating his vessel, S/V PENINGO

under sail.

7. The S/V PENINGO was operating on the port tack and the S/V HULA GIRL was on a starboard tack.
8. Rule 12 of the Rules of the Road state that the S/V PENINGO was the “giveaway” vessel and was required to make “early and substantial action to avoid collision.”
9. Mr. Dougherty failed to make early and substantial action to avoid the collision and struck Mr. Shannon’s vessel.

COUNT I
GENERAL MARITIME LAW- NEGLIGENCE

10. Paragraphs 1-9 are realleged and incorporated herein.
11. The damages sustained by the Plaintiff were no fault of his own but were caused by the negligence of the Defendant in that the Defendant had a duty to avoid collisions by operating the S/V PENINGO in a safe manner and in compliance with the Rules of Navigation. The Defendant breached that duty causing damages to the plaintiff.
12. As a result of the Defendant’s negligence, the Plaintiff has sustained a total loss of his vessel and other damages as will be shown at the trial.
13. This cause of action is brought for negligence under the General Maritime Law.

REQUEST FOR RELIEF

1. Under Count I, that this court enter judgment in favor of the Plaintiff against the Defendant.
2. For such other relief as this court deems appropriate.

PLAINTIFF DEMANDS TRIAL BY JURY ON ALL COUNTS.

Respectfully submitted,
For the Plaintiff,
By his attorney,

/s/ Brian Keane

Brian Keane, BBO #656717
Keane Law Group, P.C.
110 K Street, Suite 330
Boston, MA 02127
617-313-2900
bkeane@keanelawgroup.com